
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:) Case No.: 17-34222
)
Jeanette Steward,) Chapter 13
)
) Judge A. Benjamin Goldgar
Debtor.)

NOTICE OF MOTION

TO: Jeanette Steward, 2118 W 73rd St Chicago, IL 60636 *via email*

Marilyn O. Marshall, Chapter 13 Trustee, 224 S. Michigan Ave., Ste. 800, Chicago, IL 60604 *via ECF clerk's electronic delivery system*

Wells Fargo Bank, N.A. c/o Codilis & Associates, P.C., 15W030 N. Frontage Road Suite 100, Burr Ridge, IL 60527 *via ECF clerk's electronic delivery system*

See attached service list

PLEASE TAKE NOTICE that on **Tuesday, November 27, 2018 at 9:30 a.m.**, I shall appear before the Honorable A. Benjamin Goldgar at the Dirksen Federal Building, 219 S. Dearborn St., Room 642, Chicago, IL, or any judge presiding and then and there present the Motion, a copy of which is attached hereto.

By: /s/ Thomas Stahulak
Thomas Stahulak

Certificate of Service

I, Thomas Stahulak, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the forgoing Notice upon the parties named above on **October 31, 2018** before the hour of 5:30 p.m. from the office located at 53 W. Jackson Blvd, Ste 652, Chicago, Illinois 60604.

By: /s/ Thomas Stahulak
Thomas Stahulak
Counsel for Debtor(s)
STAHULAK & ASSOCIATES, LLC.
53 W. Jackson Blvd., Suite 652
Chicago, Illinois 60604
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info@getfiled.com

Label Matrix for local noticing

0752-1

Case 17-34222

Northern District of Illinois

Chicago

Wed Nov 15 15:47:07 CST 2017

AmeriCredit/GM Financial

Po Box 183853

Arlington, TX 76096-3853

U.S. Bankruptcy Court

Eastern Division

219 S Dearborn

7th Floor

Chicago, IL 60604-1702

Aargon Agency

Attn: Bankruptcy Department

8668 Spring Mountain Rd

Las Vegas, NV 89117-4132

Citibank North America
Citicorp Credit Svcs/Centralized Bankrup
Po Box 790040
Saint Louis, MO 63179-0040Citibank/The Home Depot
Citicorp Cr Svcs/Centralized Bankruptcy
Po Box 790040
St Louis, MO 63179-0040CAPITAL ONE BANK (USA), N.A.
PO Box 12907
Norfolk, VA 23541-0907Commonwealth Edison
1919 SWIFT DR
CLAIMS & COLLECTIONS
Oak Brook, IL 60523-1502Credit Management, LP
Credit Management, LP
Po Box 118288
Carrolton, TX 75011-8288Comcast
1255 W. North Ave
Chicago, IL 60642-1562Eye Center Physicians, Ltd
1725 W. Harrison Street, Suite 906
Chicago, IL 60612-3848First Premier Bank
601 S Minnesota Ave
Sioux Falls, SD 57104-4868Credit One Bank Na
Po Box 98873
Las Vegas, NV 89193-8873M J Altman Companies I
Po Box 3070
Ocala, FL 34478-3070Med Business Bureau
1460 Renaissance Dr #400
Park Ridge, IL 60068-1349Metropolitan Advanced Radiological
1362 Paysphere Circle
Chicago, IL 60674-0013Midland Funding
Attn: Bankruptcy
Po Box 939069
San Diego, CA 92193-9069Rush University Medical Center
75 Remittance Drive Dept 1620
Chicago, IL 60675-1620Trust Rec Sv
541 Otis Bowen Drive
Munster, IN 46321-4158(p)WELLS FARGO BANK NA
WELLS FARGO HOME MORTGAGE AMERICAS SERVICING
ATTN BANKRUPTCY DEPT MAC X7801-014
3476 STATEVIEW BLVD
FORT MILL SC 29715-7203Jeanette Steward
2118 W 73rd St
Chicago, IL 60636-3622Linda Taniguchi
STAHLAK & ASSOCIATES, L.L.C. / GetFiled
53 W Jackson Boulevard, Suite 652
Chicago, IL 60604-3459Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Wfhm
8480 Stagecoach Cir
Frederick, MD 21701

End of Label Matrix
Mailable recipients 25
Bypassed recipients 0
Total 25

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:) Case No.: 17-34222
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Jeanette Steward,) Chapter 13
)
Debtor.) Judge A. Benjamin Goldgar

**MOTION TO MODIFY CHAPTER 13
PLAN TO DEFER DEFAULT**

NOW COMES the Debtor, by and through Debtor's attorney, STAHLAK & ASSOCIATES, L.L.C., hereby moves this Honorable Court to enter an order modifying the Debtor's plan to raise Debtor's plan payments to \$555.00 per month, and to defer Debtor's default to the end of her plan, and in support thereof, states as follows:

1. That the Debtor filed a petition for relief pursuant to Chapter 13 of Title 11 U.S.C. on November 15, 2017.
2. That Debtor's plan was confirmed on or around March 13, 2018 with terms of \$435.00 per month for an estimated 48 months with unsecured creditors receiving approximately 10.00% of their allowed unsecured claims.
3. Debtor received a tax refund of \$5,349.00 for the Federal taxable year 2017 of which Debtor was required to send \$4,149.00 to her Trustee. Please see a copy of Debtor's 2017 Tax Return Transcripts, hereto attached and marked as "Exhibit A".
4. That Debtor spent her refund on miscellaneous home repairs and other expenses related to her discretionary budget. However, Debtor is unable to locate or produce any receipts for said expenses.
5. Debtor has adjusted her monthly discretionary budget, so she can now afford proposed

plan payments. Thus, she will be able to make her plan payments in a timely manner.

Please see Debtor's amended Schedule J, hereto attached and marked as "Exhibit B".

6. Debtor will file an amended payroll order to reflect his proposed payments. Further, Debtor will send \$555.00 good faith payment before this instant motion is heard.
7. Debtor is now seeking this Honorable Court to raise Debtor's plan payments to \$555.00 per month for the remainder of her plan, and to defer Debtor's default as of the date of this instant hearing to the end of her plan.

WHEREFORE, Debtor(s) respectfully pray this Court enter an order modifying Debtor's plan to raise Debtor's payment to \$555.00 per month for the remainder of her plan; to defer any trustee default as of the date of the entry of this court's Order to the end of her plan; and for such other and further relief this court deems just and proper.

Respectfully Submitted,

By: /s/ Thomas G. Stahulak
Thomas G. Stahulak, Esq. #6288620
Counsel for Debtor(s)
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